

**Joint Legislative Committee on Performance
Evaluation and Expenditure Review (PEER)**

Report to
the Mississippi Legislature



A Compliance and Management Review of the Dyslexia Pilot Programs of the Mississippi Department of Education

Over ten years ago, the Legislature established dyslexia pilot programs in response to the growing concern of the federal government and educational community regarding students' learning disabilities. The Mississippi Department of Education administers the dyslexia pilot programs. To participate in the programs, the state's school districts must submit responses to the department's annual request for proposals that it mails to all school districts. The department, through a selection committee, evaluates the proposals, determines the grant fund amounts, and awards grants to the districts selected.

Because the department does not document its rationale for establishing the cutoff score used in awarding grants for a given year, a third-party reviewer cannot recreate the process used for establishing that score. Also, with one exception in the last five fiscal years, the department has not fully funded the proposals of districts selected to receive grants, thereby compromising the utility of the pilot programs in identifying best practices.

PEER also found inadequate evaluation of the dyslexia pilot programs. The department did not ensure that districts that received dyslexia grants during FY 2005 measured their programs' effectiveness against the objectives included in their responses to the department's request for proposals, which was a condition of the grant agreement. Also, the department did not evaluate the effectiveness of the districts' programs to determine whether the state's investment had actually yielded improved student performance.

Finally, the department reimbursed districts' grant expenditures in FY 2005 without enforcing all requirements of the grant agreement and did not utilize the audit provision of the grant agreement. Thus the department did not ensure that all dyslexia pilot program grant funds were properly spent.

June 20, 2006

PEER: The Mississippi Legislature's Oversight Agency

The Mississippi Legislature created the Joint Legislative Committee on Performance Evaluation and Expenditure Review (PEER Committee) by statute in 1973. A joint committee, the PEER Committee is composed of seven members of the House of Representatives appointed by the Speaker and seven members of the Senate appointed by the Lieutenant Governor. Appointments are made for four-year terms with one Senator and one Representative appointed from each of the U. S. Congressional Districts. Committee officers are elected by the membership with officers alternating annually between the two houses. All Committee actions by statute require a majority vote of four Representatives and four Senators voting in the affirmative.

Mississippi's constitution gives the Legislature broad power to conduct examinations and investigations. PEER is authorized by law to review any public entity, including contractors supported in whole or in part by public funds, and to address any issues that may require legislative action. PEER has statutory access to all state and local records and has subpoena power to compel testimony or the production of documents.

PEER provides a variety of services to the Legislature, including program evaluations, economy and efficiency reviews, financial audits, limited scope evaluations, fiscal notes, special investigations, briefings to individual legislators, testimony, and other governmental research and assistance. The Committee identifies inefficiency or ineffectiveness or a failure to accomplish legislative objectives, and makes recommendations for redefinition, redirection, redistribution and/or restructuring of Mississippi government. As directed by and subject to the prior approval of the PEER Committee, the Committee's professional staff executes audit and evaluation projects obtaining information and developing options for consideration by the Committee. The PEER Committee releases reports to the Legislature, Governor, Lieutenant Governor, and the agency examined.

The Committee assigns top priority to written requests from individual legislators and legislative committees. The Committee also considers PEER staff proposals and written requests from state officials and others.

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Honorable Haley Barbour, Governor
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On June 20, 2006, the PEER Committee authorized release of the report entitled **A Compliance and Management Review of the Dyslexia Pilot Programs of the Mississippi Department of Education.**

A handwritten signature in cursive script, reading "Harvey Moss", written over a horizontal line.

Representative Harvey Moss, Vice Chair

This report does not recommend increased funding or additional staff.

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A Compliance and Management Review of the Dyslexia Pilot Programs of the Mississippi Department of Education

Executive Summary

Introduction

MISS. CODE ANN. Section 37-23-15 (1972) authorizes the Department of Education (MDE) to adopt pilot programs for testing eligible students in public schools for dyslexia and related disorders. The Legislature established the pilot programs in response to the growing concern of the federal government and educational community regarding learning disabilities that negatively affect students in the public education system.

For purposes of this review, PEER focused on dyslexia pilot program grants awarded by the department for FY 2005 (July 1, 2004, through June 30, 2005).

The Department of Education established the dyslexia pilot programs as a competitive grant program for school districts beginning in FY 1997. Grant funds may be used for consultant fees, supplies, and travel. Salaries, benefits, and salary supplements are non-allowable expenditures for the pilot programs. Program funds may not be used to support teacher units.

To participate in the pilot programs, school districts must submit responses to the department's annual request for proposals that it mails to all school districts. The department, through a selection committee, evaluates the proposals to determine which will be funded. Once the department receives its state funding for the pilot program for the upcoming fiscal year, the department staff determines the grant fund amounts and awards grants to the districts selected. From FY 1997 through FY 2006, the Department of Education funded 181 grant proposals to deliver services in sixty-one different school districts. Since the pilot programs' inception, the state has invested \$2,218,737 in providing services to students with dyslexia.

Conclusions

According to Department of Education staff, the department uses its regular grants process to award dyslexia pilot program funds to school districts. (See Appendix D, page 26, for a description of such process.) The FY 2005 request for proposals (RFP) for the pilot program stated that priority would be given to proposals that “hold the most promise for successful implementation and raising student achievement.” The department’s selection committee evaluated proposals submitted by interested school districts in response to the FY 2005 RFP. The five committee members independently scored the proposals received in accordance with selection criteria contained in the RFP, with additional points available for replicability and sustainability, for a possible 110 points.

No Documentation of Determining a Cutoff Score

Because the Department of Education does not document its rationale for establishing the cutoff score that committee members use in awarding grants for a given year, a third-party reviewer cannot recreate the process used for establishing that score.

For Fiscal Year 2005, the evaluation committee recommended that thirteen of the twenty-eight school districts that submitted proposals receive dyslexia grants.

To make award decisions, the evaluation committee utilized an average “cutoff” score of 95 to select districts to receive grants for FY 2005. During the past five fiscal years, cutoff scores utilized by evaluation committees have varied from 85 to 95. According to the department’s Dyslexia Coordinator, the department selects a cutoff score that the staff believes is appropriate for a particular fiscal year.

While the department has a legitimate need for utilizing a cutoff score for selecting meritorious proposals and the cutoff may justifiably vary from year to year, PEER determined that the department does not document the procedures used to guide the establishment of the cutoff score. Therefore, a third-party reviewer such as PEER could not recreate the process used for establishing that score. In the absence of documentation of the selection process, it is not clear whether the cutoff scores truly result in those proposals with “the most promise” receiving grants for dyslexia pilot programs.

Partial Funding of Winning Grant Proposals Compromises Pilot Program Concept

With one exception in the last five fiscal years, the Department of Education has not fully funded proposals of districts selected to receive grants, thereby compromising the utility of the pilot programs in identifying best practices.

For FY 2005 pilot program grants, the department chose to fund 85% of each participating district's requested amount, resulting in total awards that amounted to \$236,815, the approximate amount appropriated by the Legislature for the dyslexia pilot program grants. Over the past five fiscal years, the department has chosen to award grants to all but one of the pilot programs at less than 100% of the amounts requested, with percentages ranging from 46% upward.

The department applied these percentages with no evidence in the files that the selection committee had determined the effect that a reduced funding amount would have on a district's proposed dyslexia pilot program. With the exception of a grant to the West Point School District in FY 2006, the department has not fully funded any district's grant request for the past five fiscal years.

In view of the fact that these funds for educational programs have been offered to districts since FY 1997, PEER contends that the department should have been able to establish a monitoring and evaluation program capable of determining which programs are stellar educational programs, so that at some date in the future, when dyslexia programs might be expanded, districts will know which programs have been the most effective. However, the department has never embraced the need for determining which programs are most effective, instead using funds appropriated by the Legislature and allocated by the department as grants to fund many proposals, possibly of varying degrees of quality, at less than the amounts of funding that might have been needed to accomplish the goals of the proposals.

While the department's funding of specified percentages of the program's proposed grant amounts may accomplish the department's intention to fund as many proposals as possible within the constraints of funds appropriated by the Legislature and allocated by the department for dyslexia grants, such could alter the structure of the pilot programs and compromise the utility of the programs in identifying best practices.

Inadequate Evaluation of Dyslexia Pilot Programs

The FY 2005 RFP stated that the department would award grants to districts whose proposals raised student achievement. In an effort to accomplish this goal, the department required the participating districts to submit the following information:

- objectives against which the progress and success of the district's program would be measured;
- description of the method of evaluation that the district plans to use to determine the extent to which the district's program objectives are met, including, but not limited to, pre- and post-assessment of student performance;
- pre- and post-test results by specified deadlines and a narrative of the pre- and post-test results by a specified deadline;
- quarterly reports describing program implementation, student response, and other information; and,
- a project evaluation report by a specified deadline.

Districts Did Not Measure Program Effectiveness Against Program Objectives

The Department of Education did not ensure that school districts that received dyslexia grants during FY 2005 measured their programs' effectiveness against the objectives included in their responses to the department's request for proposals, which was a condition of the grant agreement.

As noted above, the department requires districts to describe the specific objectives against which their programs will be measured. The districts are also required to describe the evaluation methods, including pre- and post-assessment, that they would use to determine the effectiveness of their programs.

The department did not ensure that districts complied with some of the evaluative requirements, as follows:

- Only four of the thirteen participating districts submitted reports to the department that analyzed students' test scores and made observations regarding the students' improvement.
- PEER found no evidence in department records that any of the thirteen districts had prepared evaluation reports.
- PEER found no evidence that the districts formally assessed actions taken during the school year to accomplish the objectives stated in the RFP or the degree to which such actions improved the skills of students.

- While there is evidence in department files that most districts compiled the required quarterly reports and tested dyslexic students, there apparently was little effort on the part of the districts to interpret the data and information to draw conclusions regarding the programs' effectiveness.
- PEER found no evidence that the department attempted to ensure the district's compliance with the project evaluation reporting requirement contained in program guidelines.

Department Did Not Evaluate Overall Effectiveness of Pilot Programs

For FY 2005, the Department of Education did not evaluate the effectiveness of the districts' dyslexia pilot programs to determine whether the state's investment in the programs actually yielded improved student performance.

Although PEER found evidence that the districts submitted quarterly reports and pre- and post-test results for FY 2005 to the department as required, PEER found no evidence that the department analyzed the submitted information and drew any conclusions as to the programs' effectiveness. In addition to the fact that the department did not enforce requirements that districts provide certain evaluative information (see previous section), the department did not prescribe a standard format for the districts to submit pre-and post-test results of individual students; as a result, districts developed their own formats that varied significantly.

Without assuring that the districts compiled and submitted the information mandated by program requirements and submitted pre- and post-test results in a standard format, it would be difficult at best for the department to develop conclusions regarding the overall effectiveness of the dyslexia pilot programs. In the absence of an overall evaluation of the dyslexia programs, it is not clear how the department can make informed decisions in selecting districts to receive grants in the future.

Inadequate Administration of the Pilot Programs' Grants

Because it reimbursed districts' grant expenditures in FY 2005 without enforcing all requirements of the grant agreement, the Department of Education did not ensure that all dyslexia pilot program grant funds were properly spent or that participating students' reading performance had actually improved. Also, the department did not utilize the audit provision of the grant agreement to ensure appropriate expenditure of grant funds.

PEER reviewed FY 2005 records of the Department of Education to determine whether the department enforced grant requirements and found that for some of the

participating school districts, the department did not have some of the required information on file.

No Assurance of Expenditure of Funds for Program Purposes

Because it did not ensure that all participating districts submitted their end-of-the-year expenditure reports or supplied supporting documentation for expenditures, the Department of Education did not ensure that school districts participating in the dyslexia pilot programs during FY 2005 spent funds in accordance with grant requirements.

Although the department's request for proposals (which is incorporated by reference into the grant agreement) required each participating school district to submit end-of-the-year expenditure reports by August 5, 2005, the Department of Education did not ensure that all districts submitted their reports by the deadline. The department received end-of-the-year expenditure reports from only four of the thirteen participating districts by the August 5 deadline.

Five of the nine districts that did not submit their end-of-the-year expenditure reports for FY 2005 received pilot program grants for FY 2006 regardless of the fact that they had not complied with the reporting requirements for the previous grant year. The Department of Education does not have a policy that requires a grantee's compliance with all grant requirements in a previous grant year before awarding a grant for a subsequent year.

Failure to Enforce Some Grant Requirements

For FY 2005, the Department of Education did not ensure that one participating district complied with the requirement that all dyslexia grant funds be spent in their entirety or be returned to the department by August 5, the close-out deadline.

The department's FY 2005 request for proposals for dyslexia pilot programs stated that one "critical participation requirement" of districts selected to receive dyslexia grants was that the districts would "expend program funds in their entirety according to the approved program budget."

On November 28, 2005, PEER interviewed dyslexia program staff of the Greenwood Public School District and reviewed accounting records for the district's FY 2005 dyslexia pilot program. According to the district's accounting records, the district had expended only \$10,705.70 of \$22,440 in grant funds allocated to the district for FY 2005. The balance of the allocation, \$11,734.30, remained in a district account and had not been returned to the Department of Education.

When PEER questioned the Department of Education's Dyslexia Coordinator regarding the Greenwood district's failure to expend all of its grant funds and file an end-of-the-year expenditure report, the coordinator stated that she had sent the district a letter on October 25 requesting the return of the unspent funds. The district did not take action to return the funds in response to the district's letter. On January 11, PEER again discussed with the Dyslexia Coordinator the Greenwood district's failure to return the unspent funds as requested by the department. The department sent the district another letter on January 25 requesting the return of \$11,734.30 in dyslexia grant funds. The department received a check for this amount from the district on February 3, 2006, and deposited the funds into the state treasury.

No Auditing of Grantees

Following the close of FY 2005, the Department of Education did not audit grantees to determine whether their expenditures complied with grant requirements.

The "Grant for Specified Services" agreement between the Department of Education and districts that receive dyslexia grants states that the department "shall have access to, and the right to audit and examine any pertinent books, documents, papers, and records of grantee related to grantee's charges and performance under this grant."

In view of the fact that districts may request reimbursement for expenditures without providing supporting documentation and that at least eight districts failed to provide FY 2005 end-of-the-year expenditure reports to the department by the deadline, post-audit is particularly important. However, the department did not post-audit any school districts that received dyslexia grants during FY 2005. Thus, the department could not ensure that dyslexia pilot program funds were spent properly and resulted in improvements in students' reading performance.

Recommendations

1. The Department of Education should maintain documentation of the rationale that the MDE staff uses in determining each year's cutoff scores for awarding dyslexia pilot program grants.
2. The Department of Education's selection committee should carefully evaluate dyslexia pilot program proposals and document whether each proposal:
 - meets program requirements;

- includes a budget and total requested grant amount appropriate to the needs of the program; and,
- shows promise for improving performance of students with dyslexia.

When prudent, the department should fully fund the pilot programs scoring highest (on these criteria and on other educational criteria that the department determines), even if this results in fewer pilot programs being funded.

3. The Department of Education should ensure that school districts that receive dyslexia grants prepare and submit to the department project evaluation reports by the deadline date. In preparing the evaluation reports, the districts should measure the effectiveness of their dyslexia pilot program against the proposed objectives listed in the district's response to the department's request for proposals. School districts that fail to submit project evaluation reports by the deadline should not be eligible to receive dyslexia grants for future fiscal years.
4. In order to prepare its annual report to the Legislature regarding the dyslexia pilot programs, the Department of Education should analyze information and data submitted by the districts to determine the overall effectiveness of the pilot programs. This analysis should include, at minimum, measuring the programs' effectiveness against the objectives included in the participating districts' RFP responses, determining the programs' progress in improving student performance, and determining the most effective teaching methods.
5. The Department of Education should ensure that school districts that receive dyslexia grants prepare and submit to the department end-of-the-year expenditure reports by the deadline date. In addition, the department should adhere to its internal policy that requires a complete accounting of expenditures by budget line item during the closeout phase of the grant. The department should also consider requiring school districts to submit with their end-of-the-year expenditure reports copies of paid invoices to substantiate the expenditures. School districts that fail to submit end-of-the-year expenditure reports by the deadline should not be eligible to receive dyslexia grants for future fiscal years.
6. The Department of Education should conduct, on a sample basis, post-audits of funds granted by the department on a competitive basis (such as dyslexia pilot program grant funds) to ensure that such funds are utilized for their intended purposes, with

appropriate documentation to substantiate the use of the funds.

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A Compliance and Management Review of the Dyslexia Pilot Programs of the Mississippi Department of Education

Introduction

Authority

In response to a legislative request, the PEER Committee reviewed the Mississippi Department of Education's administration of the dyslexia pilot programs. PEER conducted this review pursuant to the authority granted by MISS. CODE ANN. Section 5-3-57 et seq. (1972).

Scope and Purpose

PEER's primary objective was to determine whether the Mississippi Department of Education (MDE) and participating school districts have administered the dyslexia pilot programs in accordance with MISS. CODE ANN. Section 37-23-15 (1972) et seq. For purposes of this review, PEER focused on dyslexia grants awarded by the department for FY 2005 (July 1, 2004, through June 30, 2005).

Method

In conducting this review, PEER:

- reviewed state law creating the dyslexia pilot programs;
- interviewed MDE staff;
- reviewed and analyzed MDE's dyslexia grantee files, documentation, and financial records;
- interviewed school district administrators and teachers and collected financial information on the dyslexia pilot programs; and,
- conducted on-site inspections at eleven of the thirteen school districts that received dyslexia

grant funds during the 2004-05 school year. (PEER did not conduct inspections at school districts located in Hancock and Harrison counties, which were recovering from Hurricane Katrina.)

Background

Legislative Action to Address Reading Disabilities

In response to the growing concern of the federal government and educational community regarding learning disabilities that negatively affect students in the public education system, the Mississippi Legislature enacted House Bill 1469 during the 1994 session to address the impact of dyslexia and related disorders. (See Appendix A, page 23, for definitions of dyslexia and related disorders.) This law was codified in MISS. CODE ANN. Section 37-23-15 (1972).

The Legislature amended Section 37-23-15 during the 1996 regular session to require the Mississippi Department of Education to:

- adopt pilot programs for testing eligible students in public schools for dyslexia and related disorders;
- make recommendations no later than January 1, 1997, to the school boards designated for the pilot programs for the delivery of services to dyslexic students; and,
- develop a report to the Legislature to be submitted to the chairmen of the Senate and House education committees not later than November 1, 1997, with recommendations as to the effectiveness of the pilot programs for students with dyslexia and whether the pilot programs should be expanded or discontinued.

Regarding the role of local school boards in the pilot programs, state law made their participation in the programs voluntary but, if they chose to participate, they were required to provide appropriate multi-sensory, systematic language-based remediation services to eligible students. The statute also stated that local school districts designated for the pilot programs could utilize any source of funds other than Minimum Program funds (now Mississippi Adequate Education Program funds) to provide services to dyslexic students.

Statutorily Required Reports to the Legislature

As required by MISS. CODE ANN. Section 37-23-15 (1972), the Department of Education submitted its statutorily required report to the chairmen of the Senate and House education committees on November 1, 1998. (PEER found no evidence that the department submitted a report to the Legislature on November 1, 1997, as required by the 1996

legislation.) The report noted that the pilot programs had served 293 students during FY 1997. The report further stated that while assessment results varied among the pilot programs, most students participating in the programs made gains and the other indicators of success were somewhat consistent. The report stated that after the pilot programs, teachers observed better communication among their peers, improved handwriting skills, increased student participation, as well as improvements in self-esteem, class participation, grades, reading, writing, and behavioral control. The report included summaries of the pilot programs conducted by the eleven participating school districts.

The report concluded by stating that the Department of Education supported continuation and expansion of the dyslexia pilot programs. The report also encouraged the Legislature to focus future funding of the pilot programs on training and general support of the districts' efforts.

Description of Dyslexia Pilot Programs

Scope of the Pilot Programs

The Mississippi Department of Education established the dyslexia pilot programs as a competitive grant program for school districts starting in FY 1997 and continues to manage it in this manner. The purpose of the program is to support regular education teachers in meeting the needs of regular students identified as having dyslexia and in need of multi-sensory, systematic language-based instruction and programming. (See Appendix B, page 24, for a description of multi-sensory teaching.) Only students who are not eligible for special education services under the Individuals with Disabilities Education Act, Part B, may be included or served by the funds of the grants. Grant funds may be used for consultant fees, supplies, and travel. Salaries, benefits, and salary supplements are non-allowable expenditures for the pilot programs. Program funds may not be used to support teacher units.

MISS. CODE ANN. Section 37-23-15 (1972) allows participating school districts to select the multi-sensory systematic language based program to be used in delivering services to dyslexic students. During FY 2005, ten of the thirteen participating school districts selected the Texas Scottish Rite Hospital Dyslexia Training Program (see Appendix C, page 25.)

Administration and Funding of the Pilot Programs

The Department of Education has assigned responsibility for the dyslexia pilot programs to its Office of Reading, Early Childhood, and Language Arts. The individual primarily responsible for interacting with the participating school districts is the Dyslexia Coordinator.

To participate in the pilot programs, school districts must submit responses to the department's annual request for proposals that the department mails to all Mississippi school districts. Once these proposals are received, the department evaluates them to determine which proposals will be funded for the following fiscal year. The department uses a selection committee consisting of five knowledgeable members in state contracts, grant requirements, and delivery of education remedial services for dyslexia and related disorders. This selection team includes individuals who are members of or external to the department staff. Its membership can change annually.

Once the department receives its state funding for the pilot program for the upcoming fiscal year, the department staff determines the grant fund amounts for each proposal that has fallen within the acceptable score range to recommend for approval to the State Board of Education. The actual grant award amount for each district is usually less than the proposed amount due to the amount of funds appropriated being less than the amount requested.

The state originally funded the dyslexia pilot programs through Education Enhancement Funds; however, funding for this program has come through state general funds since FY 2001. From FY 1997 through FY 2006, the Mississippi Department of Education approved and funded 181 of 248 submitted grant proposals to deliver education remedial services to eligible students with reading disabilities in sixty-one different school districts. Since the pilot programs' inception, the state has invested \$2,218,737 in providing services to dyslexic students. Exhibit 1, page 6, shows the number of submitted proposals, funded proposals, range of grant award amounts, and total grant funds awarded for each fiscal year.

To assist the Department of Education in managing the pilot programs, school districts selected to receive dyslexia grant funds are required by the grant agreement to provide certain programmatic, financial, and analytical data and information to the department. Exhibit 2, page 7, presents the required information and deadlines associated with grants awarded to school districts during FY 2005.

Exhibit 1: Fiscal Years 1997-2006 Summary of Submitted and Funded School District Proposals, Range of Individual Grant Awards, and Total State Grant Funds Awarded to the Dyslexia Pilot Programs

Fiscal Year	Proposals Submitted	Proposals Funded	Range of Grant Award Amounts	Total Grant Funds Awarded
1997	17	11	\$6,051 to \$20,000	\$200,000
1998	10	10	\$3,120 to \$5,739	50,000
1999	22	22	\$2,500 to \$20,000	210,000
2000	25	22	\$5,000 to \$16,000	260,000
2001	31	24	\$6,000 to \$16,000	289,576
2002	24	24	\$4,450 to \$12,000	252,956
2003	40	24	\$4,469 to \$14,069	239,958
2004	30	16	\$4,670 to \$26,480	239,914
2005	28	13	\$9,959 to \$25,500	236,815
2006	21	15	\$6,518 to \$22,190	239,518
TOTAL	248	181		\$2,218,737

SOURCE: Mississippi Department of Education.

Exhibit 2: FY 2005 Required Information and Deadlines for Dyslexia Pilot Programs

April 7, 2004	Request for Proposals is disseminated to all school district superintendents.
May 18, 2004	Proposals due from interested school districts.
May 24-25, 2004	Proposals reviewed. Selection committee evaluates, scores, ranks the grant proposals. Dyslexia staff establishes cutoff score and sets award amounts for each school district whose proposal received a grant.
June 21, 2004	MDE announces dyslexia grant awards to selected school districts. MDE requests revised project budgets from school districts.
July 23, 2004	School districts are authorized to begin spending dyslexia grant funds, pending MDE's receipt of a signed grant agreement and revised project budget.
Monthly	School districts submit reimbursement requests by the 10 th of each month, if they choose.
August 29, 2004	School districts submit class schedules and rolls (days, times, teaching locations, and student rosters).
October 6, 2004	1 st quarterly report due from school districts. School districts submit pre-test results to MDE.
December 3, 2004	2 nd quarterly report due from school districts.
December 2004	Dyslexia Coordinator makes site visits to school districts to observe districts' implementation of proposals. Coordinator completes Technical Assistance Reporting forms.
February 18, 2005	3 rd quarterly report due from school districts.
March/April 2005	Dyslexia Coordinator makes site visits to school districts to observe districts' implementation of proposals. Coordinator completes Technical Assistance/Professional Development reporting forms.
April 29, 2005	4 th quarterly report due from school districts.
May 13, 2005	School districts submit post-test results to MDE, including a narrative of the pre- and post-test results.
June 30, 2005	Deadline for obligating and expending dyslexia grant funds. Unspent funds must be returned to MDE.
August 5, 2005	Dyslexia grants closeout period. Deadline for school districts' requests of dyslexia grant funds and for submitting expenditure reports and project evaluations.

SOURCE: PEER analysis of FY 2005 request for proposals and program guidelines.

Conclusions

According to the Department of Education's staff, the department uses its regular grants process to award dyslexia pilot program funds to school districts. (See Appendix D, page 26, for a description of such process.) The FY 2005 request for proposals (RFP) stated that the department would award dyslexia grants to at least one school district in each of the state's four congressional districts, provided the department received quality proposals that met the RFP requirements. (The department's requests for proposals for at least the past five fiscal years contained similar language.) The RFP also stated that priority would be given to proposals that "hold the most promise for successful implementation and raising student achievement."

As required by the Department of Education's "Grant Process" standard operating procedure, the Office of Reading, Early Childhood, and Language Arts used a five-person selection committee to evaluate proposals submitted by interested school districts in response to the FY 2005 request for proposals (RFP). A contract officer from the Office of Educational Accountability, a department staff person with knowledge or expertise of the grant requirements, two other staff persons from within the department, and a representative of the Office of Reading, Early Childhood, and Language Arts comprised the selection committee. Committee members independently scored the proposals received from the twenty-eight school districts interested in receiving FY 2005 dyslexia grants in accordance with the following selection criteria contained in the RFP.

- Need (10 points)
- Identification of students (15 points)
- Project objectives (15 points)
- Multisensory, systematic language-based program (20 points)
- Evaluation (15 points)
- Professional development (15 points)
- Budget (10 points)

In addition to the 100 points for the criteria listed above, committee members were allowed to award proposals an additional 5 points for replicability—i.e., how easily the district's dyslexia program could be replicated at other schools within the district—and 5 points for

sustainability—i.e., how the district’s dyslexia program could be continued if grant funds were not available in the future. Therefore, a district’s proposal could receive a maximum of 110 points.

PEER found problems with the department’s process for awarding dyslexia grants due to a lack of documentation of procedures for determining cutoff scores for making award decisions. In addition, PEER found that the department’s failure to fund districts’ proposals fully could limit the effectiveness of the districts’ dyslexia programs.

No Documentation of Determining a Cutoff Score

Because the Department of Education does not document its rationale for establishing the cutoff score that Dyslexia staff use in awarding grants for a given year, a third-party reviewer cannot recreate the process used for establishing that score.

In its FY 2005 request for proposals, the department stated that it would award dyslexia grants to districts receiving the highest points and “whose proposals are the most advantageous to the Mississippi Department of Education, and/or are comprehensive and responsive as determined by the selection committee.” For Fiscal Year 2005, the Dyslexia staff recommended that thirteen of the twenty-eight school districts that submitted proposals receive dyslexia grants.

To make award decisions, the selection committee utilized an average “cutoff” score of 95 to select districts to receive grants for FY 2005. (To determine the proposals that scored above or below the cutoff score, the department averaged the selection committee members’ scores for each district’s proposal.) Average scores received by the thirteen districts selected to receive grants ranged from 94.6 to 103.2.

In the absence of documentation of the selection process, it is not clear whether the cutoff scores truly result in those proposals with “the most promise” receiving grants for dyslexia pilot programs.

During the past five fiscal years, cutoff scores utilized by selection committees have varied, as follows: FY 2002, 90; FY 2003, 90; FY 2004, 85; FY 2005, 95; and, FY 2006, 90. According to the department’s Dyslexia Coordinator, the department selects cutoff scores that the staff believes are appropriate for a particular fiscal year so that the department may fund as many proposals as possible within the constraints of the funds appropriated by the Legislature and allocated by the department to the pilot programs.

While the department has a legitimate need for utilizing a cutoff score for selecting meritorious proposals and the cutoff may justifiably vary from year to year, PEER determined that the department does not document the procedures used to guide the establishment of the cutoff

score. Without a documented record of the rationale the committee used to make its selections, it would be difficult for other department staff or external reviewers such as PEER to recreate the process used for establishing that score. For example, from the scores alone it would be difficult to understand how the quality of the proposal submitted by Greenville Public Schools differs materially from that of the Vicksburg-Warren School District. The Greenville proposal received an average score of 94 (one point below the cutoff), while the Vicksburg-Warren County proposal received an average score of 94.6, which the committee rounded up to 95. In the absence of documentation of the selection process, it is not clear whether the cutoff scores truly result in those proposals with “the most promise” receiving grants for dyslexia pilot programs.

Partial Funding of Winning Grant Proposals Compromises Pilot Program Concept

With one exception in the last five fiscal years, the Department of Education has not fully funded proposals of districts selected to receive grants, thereby compromising the utility of the pilot programs in identifying best practices.

In its FY 2005 request for proposals (RFP), the department stated that grant awards would be contingent upon legislative appropriation. For FY 2005, the Legislature did not specifically designate through a line-item entry in the department’s appropriation bill the amount of funds for the dyslexia pilot programs (as it did prior to FY 2001), but included general funds within the department’s “subsidies, loans, and grants” category for dyslexia grants.

Department of Education staff state that during the legislative session they consult with legislators from both houses to determine the portion of the department’s general funds that the Legislature envisions being expended on the dyslexia pilot programs. The department then approves the allocation of that amount to the dyslexia pilot programs or chooses to increase the amount by allocating more general fund dollars to the pilot programs. The FY 2005 request for proposals did not include a total amount that the department planned to allocate to the pilot programs. (Because the Governor did not sign the FY 2005 Department of Education appropriation bill until May 20, 2004, which was after the April 7 issue date of the department’s request for proposals, the department could not include in the RFP an exact amount of funds that it intended to allocate to the dyslexia pilot programs.) However, the RFP noted that amounts of past dyslexia grants awarded to school districts ranged between \$2,500 and \$26,000.

While the RFP did not impose any constraints on the scope of a pilot program proposed by a district or the budget

associated with such program, the past award ranges listed in the RFP gave interested districts a general idea of the level of funding that the department might possibly award. The RFP further stated that the department reserved the right to negotiate award amounts with school districts selected to receive grants. For FY 2005 grants, the thirteen districts selected to receive grants requested a total of \$279,178.77 in dyslexia funds. The department chose to fund 85% of each district's requested amount, resulting in total awards that amounted to \$236,815, the approximate amount appropriated by the Legislature for the dyslexia pilot program grants.

In fact, with one exception (a grant to the West Point School District in FY 2006), over the past five fiscal years, the department has chosen to award grants to all of the pilot programs at less than 100% of the amounts requested. The department has awarded grants at varying percentages of the requested grant amounts, as listed below.

- FY 2002: 46% to 60%
- FY 2003: 47% to 71%
- FY 2004: 88%
- FY 2005: 85%
- FY 2006: 77% to 105%

The department applied these percentages with no evidence in the files that the selection committee determined the effect that a reduced funding amount would have on a district's proposed dyslexia pilot program.

PEER contends that the department should have been able to establish a monitoring and evaluation program capable of determining which programs are stellar educational programs so that at some date in the future, when dyslexia programs might be expanded, districts will know which programs have been the most effective.

In the absence of written procedures addressing how the department determines grant amounts, it is not clear how department staff establish the percentages to fund dyslexia grants or whether those percentages result in dyslexia programs that raise student achievement as envisioned in the department's request for proposals and by the districts that submitted responses to the RFP.

While the pilot program described in law relates to the testing of students with dyslexia and other disorders, school districts receiving pilot funds also receive funds for the education of students identified as suffering from dyslexia. These funds are to assist them in learning in areas where their condition makes learning more difficult than it would for students not affected by dyslexia. In view of the fact that these funds for educational programs have been offered to districts since FY 1997, PEER contends that the department should have been able to establish a monitoring and evaluation program capable of determining which programs are stellar educational programs so that at some date in the future, when dyslexia programs might be expanded, districts will know which

programs have been the most effective. However, the department has never embraced the need for determining which programs are most effective, instead using funds appropriated by the Legislature and allocated by the department as grants to fund many proposals, possibly of varying degrees of quality, at less than the amount of funding that might have been needed to accomplish the goals of the proposals.

The department has used funds appropriated by the Legislature and allocated by the department as grants to fund many proposals for dyslexia programs at less than the amount of funding that might have been needed to accomplish the goals of the proposals.

Although the department's funding of specified percentages of the program's proposed grant amounts may accomplish the department's intention to fund as many proposals as possible within the constraints of funds appropriated by the Legislature and allocated by the department for dyslexia grants, such method could compromise the effectiveness of the programs of districts receiving grants. For example, the district proposal receiving the highest average score, presumably the "best" demonstration proposal, would probably have to scale back its dyslexia program because it received only a percentage of the funds needed to accomplish its proposed program. If a district had submitted a proposal with a proposed budget appropriate to the needs of the pilot program, receiving only a percentage of the funds requested could change the entire structure of the program, including the number of students served and the methods used to instruct those students.

Inadequate Evaluation of Dyslexia Pilot Programs

As stated in the FY 2005 request for proposals (RFP), the purpose of the department's dyslexia pilot programs is to "support regular education teachers in meeting the needs of regular education students identified as having dyslexia and in need of multi-sensory, systematic language-based instruction and programming." The RFP also stated that the department would award grants to districts whose proposals raised student achievement.

In an effort to accomplish this goal, the department incorporated accountability measures into its and the districts' administration of the pilot programs, as detailed below.

- The department's RFP requires a school district requesting a dyslexia grant to state the objectives against which the progress and success of the district's program would be measured, including a description of the activities and timelines to achieve those objectives.
- The RFP also requires a school district requesting a dyslexia grant to describe the method of evaluation that the district plans to use to determine the extent to which the district's program objectives

are met, including, but not limited to, pre- and post-assessment of specific performance levels of students participating in the project.

- For FY 2005, the department required school districts that received dyslexia grants to report pre-test results by October 6, 2004, and post-test results by May 13, 2005. In addition, such districts were required to submit a narrative of the pre- and post-test results by May 13.
- During FY 2005, the department required school districts that received dyslexia grants to submit quarterly reports describing how the school's program had been implemented, how the students responded, a description of the school's involvement with parents, a description of components of the program that worked well with the students, and a description of any difficulties experienced within the program.
- The department's Dyslexia Coordinator conducted two site visits (or telephone conferences in some cases) to school districts to observe the districts' implementation of the pilot programs and provide any needed technical assistance or professional development.
- For FY 2005, the department required districts that received dyslexia grants to submit a project evaluation report by August 5, 2005.

Taken together, the accountability measures and reporting requirements described above should have allowed the school districts that received dyslexia grants to evaluate their individual programs and allowed the department to evaluate the overall effectiveness of the state's investment in the dyslexia pilot programs during FY 2005. However, PEER determined that neither the school districts nor the department took the steps necessary to determine the pilot programs' effectiveness.

Districts Did Not Measure Program Effectiveness Against Program Objectives

The Department of Education did not ensure that school districts that received dyslexia grants during FY 2005 measured their programs' effectiveness against the objectives included in their responses to the department's request for proposals, which was a condition of the grant agreement.

As stated on page 12, the department requires school districts to include within their responses to the request for proposals for dyslexia grants a description of the specific objectives against which the districts' programs will be measured. The districts are also required to describe the evaluation methods, including pre- and post-

assessment, that they would use to determine the effectiveness of their programs.

PEER reviewed the RFP responses of the thirteen school districts that received dyslexia grants during FY 2005 and determined that each district complied with the RFP requirements by listing program objectives and evaluation methods. Proposed objectives included items such as increasing students' reading and comprehension skills by one or more grade level; reducing retention rates of students enrolled in kindergarten classes; providing professional development opportunities for teachers involved in dyslexia teaching; and, increasing parental participation and support. Proposed evaluation methods primarily included pre- and post-testing of dyslexic students, as well as analysis of qualitative data and input from students, teachers and parents.

Only four of the thirteen districts that received dyslexia grants during FY 2005 submitted reports to the department that analyzed students' test scores and made observations regarding the students' improvement. Also, PEER found no evidence in department records that any of the thirteen districts had prepared evaluation reports.

Although the department required school districts that received dyslexia grants to prepare and submit narratives (or interpretations) of FY 2005 pre- and post-test results by May 13, 2005, PEER found that only four of the thirteen districts submitted reports to the department that analyzed students' test scores and made observations regarding the students' improvement. In addition, although the department required school districts to prepare and submit project evaluation reports by August 5, 2005, PEER found no evidence in department records that any of the thirteen districts had prepared the evaluation reports. Specifically, PEER found no evidence that the districts reviewed each objective contained in their responses to the RFP and formally assessed actions taken during the school year to accomplish the objectives or the degree to which such actions improved the skills of dyslexic students. While there is evidence in department files that most districts compiled the required quarterly reports and tested dyslexic students, there apparently was little effort on the part of the districts to interpret the data and information to draw conclusions regarding the programs' effectiveness. PEER also found no evidence that the department attempted to ensure the district's compliance with the project evaluation reporting requirement contained in program guidelines.

Department Did Not Evaluate Overall Effectiveness of Pilot Programs

For FY 2005, the State Department of Education did not evaluate the effectiveness of the districts' dyslexia pilot programs to determine whether the state's investment in the programs actually yielded improved student performance.

Just as the school districts that received dyslexia grants should have assessed the effectiveness of their individual programs, the State Department of Education had a

responsibility to evaluate the overall effectiveness of the dyslexia pilot programs to ensure that the programs had positive results. Evaluation theory and literature address the components of an evaluation effort. For example, according to *Evaluation: A Systematic Approach* by Rossi, Freeman, and Wright, an evaluation should be:

. . .the systematic collection of information about the program in order to enable the stakeholders to better understand the program, to improve program effectiveness, and to make decisions about future programming.

Although PEER found evidence that the districts submitted quarterly reports and pre- and post-test results for FY 2005 to the department as required, PEER found no evidence that the department analyzed the submitted information and drew any conclusions as to the programs' effectiveness. Several factors may have contributed to the department's failure to evaluate the programs, as detailed below.

- The department did not assure that the districts submitted narratives of their students' pre- and post-test results as mandated by program requirements. (As stated on page 14, only four of the thirteen districts submitted interpretive narratives of test results for FY 2005.)
- The department did not assure that the districts complied with program requirements by submitting year-end project evaluation reports. (As stated on page 14, none of the thirteen districts submitted evaluation reports.)
- The department did not prescribe a standard format for the districts to submit pre-and post-test results of individual students. As a result, districts developed their own formats that varied significantly. For example, some districts submitted the test results in memorandum format stating the number of students, percent of increase or decrease, and an overall improvement in student performance. Some districts submitted test results in a graph format showing bar graphs of students' increases and decreases from pre- and post-test results. Finally, some districts submitted actual raw test scores of individual students

It appears that the primary reason for the lack of an overall evaluation effort is the department's contention that there are too many factors affecting a student's education to be able to isolate those associated with dyslexia teaching. The department believes that an overall evaluation could be difficult because each district implements its pilot program using different methods and

In the absence of an overall evaluation of the dyslexia programs, it is not clear how the department could make informed funding decisions in future fiscal years regarding the programs.

the number of students participating in the programs is too small for a formal research study. The department contends that it would require additional funds to conduct an evaluation of the pilot programs.

While PEER understands that the pilot programs might not lend themselves to a formal controlled experiment-type research, this does not relieve the department of its responsibility to gauge the overall programmatic success of the pilot programs. Without assuring that the districts compiled and submitted the information mandated by program requirements, it would be difficult, at best, for the department to develop conclusions regarding the overall effectiveness of the dyslexia pilot programs. In the absence of an overall evaluation of the dyslexia programs, it is not clear how the department could make informed decisions when selecting districts to receive funding in future fiscal years or expanding the pilot programs statewide, determining which teaching methods are most effective in educating dyslexic students, or identifying components of the pilot programs that should be modified to improve student performance.

Inadequate Administration of the Pilot Programs' Grants

Because it reimbursed districts' grant expenditures in FY 2005 without enforcing all requirements of the grant agreement, the Department of Education did not ensure that all dyslexia pilot program grant funds were properly spent or that participating students' reading performance had actually improved. Also, the department did not utilize the audit provision of the grant agreement to ensure appropriate expenditure of grant funds.

As stated on page 5, the department's request for proposals and program guidelines mandate to districts that receive dyslexia grants the information that must be submitted to the department and the reporting deadlines for such submissions. PEER reviewed FY 2005 records of the Department of Education to determine whether the department enforced grant requirements and found that for some of the participating school districts, the department did not have some of the required information on file. In FY 2005, the Department of Education reimbursed districts' grant expenditures without requiring the submission of end-of-the-year expenditure reports or supporting documentation, without one district returning unspent grant funds until February 3, 2006, and without post-auditing any of the districts' expenditures.

No Assurance of Expenditure of Funds for Program Purposes

Because it did not ensure that all participating districts submitted their end-of-the-year expenditure reports or supplied supporting

documentation for expenditures, the Department of Education did not ensure that school districts participating in the dyslexia pilot programs during FY 2005 spent funds in accordance with grant requirements.

The department does not require that supporting documentation—i.e., copies of purchase orders and invoices—be submitted prior to requesting a reimbursement for the dyslexia program.

Although the department's request for proposals (which is incorporated by reference into the department's grant agreement with schools that received dyslexia grants) required each participating school district to submit end-of-the-year expenditure reports by August 5, 2005, the Department of Education did not ensure that all districts submitted their reports by the deadline. The department received end-of-the-year expenditure reports from only four of the thirteen participating districts by August 5.

Even if the department had obtained these reports, the department still could not have verified that the funds were spent properly because the department does not require that supporting documentation—i.e., copies of purchase orders and invoices—be submitted to the department prior to requesting a reimbursement. Department of Education accounting staff described the districts' ability to request and receive reimbursements electronically and the department's failure to request supporting documentation as an "honor system" for disbursing grant funds. Although not required, some school districts submitted supporting documentation for expenditures in FY 2005 as a good management practice and substantiated their compliance with grant requirements.

Because the department does not require participating districts to comply with the requirement for filing an end-of-the-year expenditure report, nor does it require appropriate supporting documentation and review thereof, the Department of Education could not ensure that these school districts expended their dyslexia grant funds in accordance with grant requirements. The department's failure to require all school districts that received dyslexia grants to file end-of-the-year reports also violates departmental policies for grant closeout procedures. The policy (Section 18.0, Grant Process and Modification) states that "prior to the final payment, each discretionary or competitive grant will be formally closed out. This close-out will require an accounting, by budget line item, of the expenditures made under provisions of the grant."

The department does not have a policy that requires a grantee's compliance with all grant requirements in a previous grant year before awarding a grant for a subsequent year.

Five of the nine districts that did not submit their end-of-the-year expenditure reports for FY 2005 received pilot program grants for FY 2006 regardless of the fact that they had not complied with the reporting requirements for the previous grant year. The Department of Education does not have a policy that requires a grantee's compliance with all grant requirements in a previous grant year before awarding a grant for a subsequent year.

Failure to Enforce Some Grant Requirements

For FY 2005, the Department of Education did not ensure that one participating district complied with the requirement that all dyslexia grant funds be spent in their entirety or be returned to the department by August 5, the close-out deadline.

The department's FY 2005 request for proposals for dyslexia pilot programs states that one "critical participation requirement" of districts selected to receive dyslexia grants is that the districts would "expend program funds in their entirety according to the approved program budget." As stated previously, the department allows districts that receive dyslexia grants to request reimbursement of such funds as expenses are obligated. The reimbursement process involves district staff certifying through the use of an electronic signature that the expenses are allowable and that the expenditures have already been incurred and/or obligated prior to the reimbursement request being made.

On November 28, 2005, PEER interviewed dyslexia program staff of the Greenwood Public School District and reviewed accounting records for the district's FY 2005 dyslexia pilot program. According to the district's accounting records, the district had expended only \$10,705.70 of \$22,440 in grant funds allocated to the district for FY 2005, which ended June 30, 2005. The balance of the allocation, \$11,734.30, remained in a district account and had not been returned to the Department of Education.

In reviewing the Department of Education's file for the Greenwood Public School District, PEER determined that the district had not submitted an FY 2005 end-of-the-year expenditure report, as mandated by program requirements. The file also contained an undated document in which the Dyslexia Coordinator noted that all of the district's \$22,400 had been expended. (Dyslexia staff report that the Dyslexia Coordinator does not routinely examine a school district's accounting records for the pilot program during the site visit.) In addition, the file contained a copy of an October 19, 2005, letter in which the department informed the district that it had complied with state laws governing the dyslexia pilot programs. The letter did not address the district's failure to meet all grant reporting requirements or the district's failure to expend fully grant funds or return unspent funds to the department.

When PEER questioned the Department of Education's Dyslexia Coordinator regarding the Greenwood district's failure to expend all of its grant funds and file an end-of-the-year expenditure report, the coordinator stated that she had sent the district a letter on October 25 requesting

the return of the unspent funds. The district did not take action to return the funds in response to the district's letter. On January 11, PEER again discussed with the Dyslexia Coordinator the Greenwood district's failure to return the unspent funds as requested by the department. The department sent the district another letter on January 25 requesting the return of \$11,734.30 in dyslexia grant funds. The department received a check for this amount from the district on February 3, 2006, and deposited the funds into the state treasury.

No Auditing of Grantees

Following the close of FY 2005, the Department of Education did not audit grantees to determine whether their expenditures complied with grant requirements.

The "Grant for Specified Services" agreement entered into between the Department of Education and school districts that receive dyslexia grants states the department "shall have access to, and the right to audit and examine any pertinent books, documents, papers, and records of grantee related to grantee's charges and performance under this grant." The agreement requires school districts to maintain records associated with the grant for a period of five years after final payment has been provided to the district by the department. The agreement further states that the grantee agrees to refund to the department any overpayments disclosed by any audit.

Because the department did not post-audit any school districts that received dyslexia grants during FY 2005, it could not ensure that dyslexia pilot program funds were spent properly and resulted in improvements in students' reading performance.

In view of the fact that districts may request reimbursement for expenditures electronically without providing supporting documentation to the department and at least eight districts failed to provide FY 2005 end-of-the-year expenditure reports to the department by August 5, post-audit is particularly important. The department did not post-audit any school districts that received dyslexia grants during FY 2005. Thus, the department could not ensure that dyslexia pilot program funds were spent properly and resulted in improvements in students' reading performance. Had the department post-audited FY 2005 dyslexia grants the department could have at least detected the unspent funds being maintained by the Greenwood district.

Recommendations

1. The Department of Education should maintain documentation of the rationale that the MDE staff uses in determining each year's cutoff scores for awarding dyslexia pilot program grants.
2. The Department of Education's selection committee should carefully evaluate dyslexia pilot program proposals and document whether each proposal:
 - meets program requirements;
 - includes a budget and total requested grant amount appropriate to the needs of the program; and,
 - shows promise for improving performance of students with dyslexia.

When prudent, the department should fully fund the pilot programs scoring highest (on these criteria and on other educational criteria that the department determines), even if this results in fewer pilot programs being funded.

3. The Department of Education should ensure that school districts that receive dyslexia grants prepare and submit to the department project evaluation reports by the deadline date. In preparing the evaluation reports, the districts should measure the effectiveness of their dyslexia pilot program against the proposed objectives listed in the district's response to the department's request for proposals. School districts that fail to submit project evaluation reports by the deadline should not be eligible to receive dyslexia grants for future fiscal years.
4. In order to prepare its annual report to the Legislature regarding the dyslexia pilot programs, the Department of Education should analyze information and data submitted by the districts to determine the overall effectiveness of the pilot programs. This analysis should include, at minimum, measuring the programs' effectiveness against the objectives included in the participating districts' RFP responses, determining the programs' progress in improving student performance, and determining the most effective teaching methods.
5. The Department of Education should ensure that school districts that receive dyslexia grants prepare and submit to the department end-of-the-year expenditure reports by the deadline date. In addition,

the department should adhere to its internal policy that requires a complete accounting of expenditures by budget line item during the closeout phase of the grant. The department should also consider requiring school districts to submit with their end-of-the-year expenditure reports copies of paid invoices to substantiate the expenditures. School districts that fail to submit end-of-the-year expenditure reports by the deadline should not be eligible to receive dyslexia grants for future fiscal years.

6. The Department of Education should conduct, on a sample basis, post-audits of funds granted by the department on a competitive basis (such as dyslexia pilot program grant funds) to ensure that such funds are utilized for their intended purposes, with appropriate documentation to substantiate the use of the funds.

Appendix A: Glossary

- *Dyslexia*: a language processing disorder that may be manifested by difficulty processing expressive or receptive, oral or written language despite adequate intelligence, educational exposure, and cultural opportunity. Specific manifestations may occur in one or more areas, including difficulty with the alphabet, reading comprehension, writing, and spelling.
- *Related disorders*: disorders similar to or related to dyslexia such as developmental auditory imperception, dysphasia, specific developmental dyslexia, developmental dysgraphia, and developmental spelling disability.
- *Developmental Auditory Imperception*: Difficulties in perceiving and using what is heard. The student may have difficulty with auditory processing, auditory discrimination, and/or learning sound-symbol association.
- *Dysphasia*: A severe difficulty with expressive and receptive oral language.
- *Specific Developmental Dyslexia*: Difficulty with all areas of language.
- *Developmental Dysgraphia*: A severe difficulty in producing handwriting that is legible and written at an age-appropriate speed.
- *Developmental Spelling Disability*: Difficulty with learning to spell.

SOURCE: MISS. CODE ANN. Section 37-23-15 (1)(d) (1972) and Mississippi Department of Education's *Mississippi Dyslexia Handbook*.

Appendix B: Description of Multi-Sensory Teaching

Multi-sensory teaching is simultaneously visual, auditory, and kinesthetic-tactile to enhance memory and learning. Links are consistently made between the visual (what we see), auditory (what we hear), and kinesthetic-tactile (what we feel) pathways in learning to read and spell.

Teachers who use this approach teach children to link the sounds of the letters with the written symbol. Children also link the sound and symbol with how it feels to form the letter or letters. As students learn a new letter or pattern, they trace, copy, and write the letter while saying the corresponding sound. The teacher may make the sound and the student gives the letter name. Students then read and spell words, phrases, and sentences using these patterns. Teachers and students rely on all three pathways (visual, auditory, and kinesthetic-tactile) for learning rather than focusing on a “sight-word” or memory method, a “tracing method,” or a “phonetic method” alone.

According to the International Dyslexia Association, there is a growing body of evidence supporting multi-sensory teaching. Current research, much of it supported by the National Institute of Child Health and Human Development, converges on the efficacy of explicit structured language teaching for children with dyslexia. Young children in structured, sequential, multi-sensory intervention programs, who were also trained in phonemic awareness, made significant gains in decoding skills. These multi-sensory approaches used direct, explicit teaching of letter-sound relationships, syllable patterns, and meaning word parts.

SOURCE: PEER analysis of information on multi-sensory teaching obtained from the International Dyslexia Association website.

Appendix C: Description of Teaching Methods Used by School District Grantees During FY 2005

Program Descriptions	Number of District Grantees Using Method
<p>Association Method - This method is a phonetic multi-sensory teaching-learning strategy that was designed for language deficient children. The Association Method uses the Northhampton Symbol system for teaching sound-symbol relationships for reading. Cursive writing is used for initial instruction. Children learn to read manuscript, but write only in cursive. The method is incremental and systematic. Instruction progresses from the teaching of individual sounds to syllables, words, and sentences. When sufficient language skills have been achieved, a transition is made to traditional textbook formats for instruction. The principles of the Association Method have been used to establish a code-breaking system for reading skills and may be used in regular education.</p>	1
<p>Multi-sensory Teaching Approach - This teaching approach is a comprehensive, multi-sensory program in reading, spelling, cursive handwriting, alphabet, and dictionary skills. It is based on the Orton-Gillingham Method and Alphabetic Phonics. It provides teaching objectives as well as a management system for documenting and monitoring student progress and planning for individualized lessons and activities. The Multi-sensory Teaching Approach Reader Series provides comprehension, practice, and fluency. Mastery of all materials enables students to read and spell 85% of the 30,000 most frequently used phonetically regular English words.</p>	1
<p>Open Book - Open Book has been developed and validated through twenty years of rigorously scientifically based research in the integration of rich-media, advanced reading theory, learning styles assessment, and prescription. It is a multi-sensory, systematic language-based program that assesses cognitive styles of learners and makes constructive suggestions for learners to take advantage of their cognitive styles.</p>	1
<p>Texas Scottish Rite Dyslexia Training Program - This program is a videotaped series of lessons presenting a curriculum designed to teach the structure of written English to elementary school-aged children. It includes multi-sensory introduction of new learning, intensive instruction in the alphabet, graphemes and phonemes, and listening and reading comprehension. It also provides for reading practice, handwriting practice, spelling practice, and sequential daily review. This program was designed for use in a class of no more than six students in second through fifth grade. It consists of five program orientation tapes, 336 one-hour instructional VHS tapes, and 14 Progress Measurement tapes.</p>	10

SOURCE: PEER analysis of the *Mississippi Dyslexia Handbook*, the Department of Education's *Report to the Mississippi Legislature on the Pilot Dyslexia Programs* for fiscal years 2002 through 2005, and the Laurel district's response to the department's FY 2005 request for proposals.

Appendix D: MDE’s Description of its Management and Accountability System for the Dyslexia Grant Program

NOTE: Upon PEER’s inquiry, MDE provided the following description of its management and accountability system for the dyslexia grant program. However, as noted in this report, PEER identified instances in which actual practice varied from these written procedures.

.....

The Dyslexia Grant Program is housed in the Office of Reading, Early Childhood and Language Arts. Management and accountability procedures for program offices within the Mississippi Department of Education are described in the MDE Policy and Procedures Manual. The Office of Reading, Early Childhood, and Language Arts follows policies and procedures as outlined in the MDE Policy and Procedures Manual.

The MDE Budget Office has the responsibility for coordinating the departmental budgets and ensuring budget authority exists prior to hiring new personnel and expending agency funds. In addition, this office handles many departmental support functions such as allocating direct charges to program areas, developing and implementing a departmental indirect cost plan, and reviewing grants and grant applications.

Internal Budget Process

The Department of Education budgets and disburses funds by its offices and divisions. The Budget Office maintains the budget by major object codes (i.e., personal services, commodities, equipment, etc.). Each May, the Budget Office provides the current budget and the expenditures for the previous year to offices via e-mail. The budget form developed and required by LBO and DFA is on diskette, if needed. The submitting office must complete the form and provide narratives describing the programs and budget justifications for all increases in major object categories. The Budget Office assists the office with projections for new positions; charges for rent, telephones, State Personnel Board services, and computer services; and, indirect cost rates. The State Dyslexia Program funds for FY06 are coded as follows:

Fund Number	Activity Code	RPTG Category	ORGN Code
2201	EA08	A846	4508

The Budget Office allocates the agency funds to each office at the beginning of each fiscal year based on the approved legislative appropriation and the office’s request. The allocation is printed on a form similar to the budget form utilized to prepare the budgets. The allocation is divided into equal amounts for expenditures for each half of the fiscal year. The budget allocation must be signed by the authorized individual and returned to the Budget Office. The allocated amount indicated on the budget form will serve as the guideline for all office expenditures. All monies received for the Dyslexia Program are coded as subsidies, loans and grants. These funds are awarded to school districts for use in implementing pilot dyslexia programs. Dyslexia funds are not used for state personnel, commodities, travel, or equipment.

The Budget Office has established policies and procedures to be followed in awarding grants to local school districts or other entities. The scope of these procedures includes grant awards from all funding sources including, but not limited to, state and federal funds. It is the responsibility of each awarding office to ensure these policies are followed.

Budget Office and MS Board of Education Notification

Prior to the beginning of the process for awarding grants, the Budget Office must be notified of the proposed total award by:

1. Organization Budget
2. Reporting Category
3. Grant Name

The Budget Office then notifies the awarding office of the status of the budget and the grant. After Budget Office approval, the awarding office formally notifies the board of the methodology to be utilized in awarding grants on a nondiscretionary or non-competitive basis, the authority for the methodology, and the total dollar amount to be awarded. The awarding office presents to the board for approval the methodology to be utilized in awarding all grants, which may be awarded on a discretionary or competitive basis, and the total dollar amount to be awarded. The awarding office also presents to the board for approval all grants in excess of \$50,000 that are to be awarded under a discretionary, or competitive, non-discretionary or non-competitive basis.

Grant Availability Notification Procedure

For all grant awards, notification of the availability of the grant is made so that eligible parties may make application. Notification is to be made in accordance with any grantor requirements and this policy or, in the absence of any grantor requirements, this policy. The notification process includes notifying known interested parties via direct mail and by advertisement in a newspaper with statewide circulation, MDE website, MDE publications, or any other appropriate means of advertisement. The notification information must include the application timelines, contact person, address, and other pertinent information. Requests for Proposals (RFP) for the Dyslexia Program are mailed to all Mississippi school district superintendents. The RFP is posted on the MDE web page and copies of the RFP have been disseminated to districts during statewide dyslexia conferences. A session regarding writing successful dyslexia grant proposals has been conducted during conference sessions as well.

Grant Application Review Procedures

MDE policy states that for discretionary or competitive grants, an evaluation committee comprised of a minimum of five individuals must be formed. This committee will evaluate the grant proposals and make the recommendations for funding awards. The committee will be comprised of the following:

- Designated Contract Officer from the Office of Educational Accountability
- MDE staff person with knowledge or expertise of the grant requirements
- Two qualified individuals (internal and/or external)
- Qualified individual inside the program office

These individuals except for #1 will be chosen by the program office. This committee must meet in sufficient time to evaluate the proposals and make recommendations for award. This will enable them to present the successful offerors to the board (if necessary).

Grant Award Procedures

A grant agreement is required for all awards of grants to local school districts and other appropriate entities. Payment shall not be processed without a grant agreement. A short grant form is available in the Contract Officer's office. The MDE Contract Signature Sheet will serve as page one (1) of the long grant form and each page of the grant must have the page number and grant number. For those offices utilizing projects, the projects must be established prior to the award being made. The grant agreement must incorporate at least the following:

1. Grant Signature Sheet (as page 1)
2. Statement of Work
3. Grant Budget Narrative
4. Grant Budget Summary
5. Standard Terms and Conditions
6. Program Reporting, Compensation and Financial Reports

The grant agreement shall be reviewed by MDE Contract Officer prior to receiving the grantee's signature. Three copies of each grant agreement must be signed by:

1. Bureau Director of awarding office
2. Superintendent's Management Team Member
3. Contract Officer

The distribution of the three signed copies is:

1. 1 copy to awarding office
2. 1 copy to Accounting
3. 1 copy to grantee

Expenditures are outlined in the budget narrative and summary. The dyslexia program coordinator reviews all proposed expenditures to ensure that these expenditures are allowable. Expenditures are reviewed again by the Bureau Director, a member of the Superintendent's Management Team, and the Contract Officer.

Once a grant has completed the approval process, the program office completes a Disbursement Listing Form indicating the grant name, coding, dates, and amount for each district. The office sends the Disbursement Listing and the individual grant documents to Accounting. Accounting matches the amounts by district on the Disbursement Listing to the signed grant documents. If they are in agreement, the amounts are entered in the School Payment System (SPS) and made available for the

district during the period of the grant. (The grant period is clearly indicated in the grant agreement.)

The district can request funds through SPS on a monthly basis during the period in which the grant is available. During that request process, an electronic signature is required and is associated with a statement that certifies that the request is related to expenditures allowable for that grant/program. In addition, SPS requires the districts to also certify that the expenditures have already been incurred and/or obligated prior to the draws being made.

A monthly SAAS Project Balance Sheet is submitted to the program office. The Bureau Director and Program Coordinator review the project balance reports in order to ensure that districts are making regular requests for reimbursement.

Modifications

The grant agreements shall be modified in accordance with MDE modification procedures. Any necessary changes to the original agreement must be accomplished through a formal modification.

Program Monitoring

Program monitoring of dyslexia programs is conducted through telephone conferences and on-site visits made by the State Dyslexia Coordinator. The Dyslexia Coordinator reviews district expenditure reports during the on-site visits. The coordinator provides appropriate feedback regarding the implementation of the dyslexia program and program expenditures. Technical assistance forms are completed to record information shared during each monitoring visit. Telephone logs are maintained for documentation of telephone conversations. Any questions regarding appropriate program implementation are shared with the Bureau Director and the Associate State Superintendent. If district implementation of the dyslexia program is found to be out of compliance with state guidelines, documentation of non-compliance is presented in writing and forwarded to the school level coordinator and the District Superintendent. Additional monitoring visits and technical assistance are provided to the district until the district's program is found to be in compliance with state policy.

Grant Close-out Procedures

Prior to the final payment, each discretionary or competitive grant is formally closed out. This close-out requires an accounting, by budget line item, of the expenditures made under provisions of the grant.

Dyslexia grants are awarded in accordance with MDE policies as outlined above. A copy of the MDE Policies and Procedures Manual may be found at the following site: http://www.mde.k12.ms.us/human_resources/mdepolicy/12_0budget.pdf.

SOURCE: Mississippi Department of Education staff.



**STATE OF MISSISSIPPI
DEPARTMENT OF EDUCATION**

Hank M. Bounds
State Superintendent of Education
May 18, 2006



Dr. Max Arinder, Director
Joint Legislative Committee on Performance
Evaluation and Expenditure Committee
P.O. Box 1204
Jackson, Mississippi 39215-1204

Dear Dr. Arinder:

Thank you for the opportunity to respond to the report on the Mississippi Dyslexia Program. The survey conducted by your staff brought to light several points the Department will need to address. The Department's comments on these points are listed below:

In order to ensure that districts comply with all grant requirements, the Mississippi Department of Education (MDE) will establish the following controls:

- MDE will change due dates for end of the year reporting deadlines to provide districts with a more realistic timeframe for submitting final reports.
- Dyslexia staff will remind districts in writing of upcoming deadlines prior to the deadline dates established in the Request for Proposals (RFP).
- MDE will provide technical assistance to districts awarded dyslexia funds related to the completion of grant evaluation reports.
- Dyslexia staff will meet with budget staff in each district at least once during the grant year to review grant expenditures.

In regard to the process of awarding future grants, MDE will document the rationale for establishing the cutoff score used in awarding grants for a given year. The Department takes exception with comments related to the partial versus full funding of dyslexia programs and will request legislative input in this area.

In addition, MDE takes exception to comments made in the PEER Report related to the following practices:

- Auditing and monitoring functions of the program office, and
- Comprehensive evaluation of program effectiveness.

MDE understands the importance of these areas; however, solutions proposed in the PEER Report are not possible with the current funding provided. All dyslexia funds are awarded to districts for program implementation.

Thank you for the professional manner in which you handled issues that arose during the final review process for this report. If I may be of further assistance, please contact me at (601) 359-1750.

Sincerely,

A handwritten signature in cursive script that reads "Hank M. Bounds".

Hank M. Bounds
State Superintendent of Education

PEER Committee Staff

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James Barber, Deputy Director
Ted Booth, General Counsel

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